

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT**

IN THE MATTER OF:

Christopher L Brush & Tonya L Brush

**CHAPTER 13
CASE NO. 18-40739-MAR
JUDGE MARK A RANDON**

Debtors _____ /

TRUSTEE'S OBJECTION TO PLAN MODIFICATION

Now Comes the Chapter 13 Trustee, KRISPEN S. CARROLL, and objects to the Proposed Plan Modification as follows:

1. Trustee requests verification of debtors' income. Trustee requires the verification to be received by the Trustee immediately.
2. Trustee objects to debtors' request to excuse remittance of the 2019 income tax refunds where the debtors have failed to provide a valid basis to do so.
3. Trustee requires debtor remit the 2018 income tax refund as required by the order entered May 8, 2019 where the debtor only submitted one receipt for dental work in the amount of \$179.50.

Wherefore, the Chapter 13 Trustee prays this Honorable Court deny the relief requested.

Dated: April 20, 2020

OFFICE OF THE CHAPTER 13 TRUSTEE -DETROIT
KRISPEN S. CARROLL, CHAPTER 13 TRUSTEE

/s/ MARIA GOTSIS

Krispen S. Carroll (P49817)
Maria Gotsis (P67107)
719 Griswold Street, Ste 1100
Detroit, MI 48226
(313) 962-5035
notice@det13ksc.com

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT**

IN THE MATTER OF:

Christopher L Brush & Tonya L Brush

**CHAPTER 13
CASE NO. 18-40739-MAR
JUDGE MARK A RANDON**

Debtors

/

CERTIFICATE OF MAILING

I hereby certify that on the date indicated below, I electronically filed TRUSTEE'S OBJECTION TO PLAN MODIFICATION with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

MARRS & TERRY PLLC
6553 JACKSON RD
ANN ARBOR, MI 48103

April 20, 2020

/s/ Barb Ecclestone

BARB ECCLESTONE

For the Office of the Chapter 13 Trustee-Detroit
719 Griswold Street, Ste 1100
Detroit, MI 48226
(313) 962-5035
notice@det13ksc.com